

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD, individually and on behalf of all others similarly situated,

Plaintiff,

v.

**PREMIUM MERCHANT FUNDING ONE,
LLC**

Defendant.

Case No. 2:24-cv-06247-JP

CLASS ACTION

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME FOR DEADLINE TO AMEND

The Plaintiff and Defendant respectfully and jointly seek an extension of time with which to file motions to amend pleadings in this matter. Currently, the deadline is April 16. However, Defendant is still in the process of completing document production, including production which may include additional Defendants. As such, the parties respectfully request that the deadline to amend the pleadings be extended to June 2, 2025. No other deadlines would be affected, and this extension is not sought for the purposes of delay or other improper purpose.

RESPECTFULLY SUBMITTED AND DATED this April 14, 2025.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this April 14, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.